

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 7
DEEPROOT CAPITAL MANAGEMENT, LLC ¹	§	BANKRUPTCY No. 21-51523
<i>DEBTORS.</i>	§	JOINTLY ADMINISTERED

IN RE:	§	CHAPTER 7
POLICY SERVICES, INC.	§	BANKRUPTCY No. 21-51513
<i>DEBTOR.</i>	§	JOINTLY ADMINISTERED

**SUPPLEMENT OF EXHIBITS WITH PROPER DESCRIPTIONS AND INCLUDING
INADVERTENTLY OMITTED EXHIBITS 4 AND 5 TO OBJECTIONS TO SALE OF THE
PROPERTY OF THE ESTATE OF POLICY SERVICES, INC. – DOC. 94**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

In the original filing of the Objector's Objections to the Sale Motion and Order (Doc. 94) filed on April 4, 2022, a clerical error was noticed that the exhibits were attached without proper descriptions and the inadvertent omission of two exhibits the filing. Objectors' Counsel apologizes for the error. This supplement contains all exhibits 1-15

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are: Policy Services, Inc (2864), Wizard Mode Media, LLC (3205), deeproot Pinball LLC (0320), deeproot Growth Runs Deep Fund, LLC (8046), deeproot 575 Fund, LLC (9404), deeproot 3 Year Bonus Income Debenture Fund, LLC (7731), deeproot BonusGrowth 5 Year Debenture Fund, LLC (9661), deeproot Tech LLC (9043), deeproot Funds LLC (9404), deeproot Studios LLC (6283), and deeproot Capital Management, LLC (2638).

which were referenced in the footnotes in the Objections, but now including descriptions as well as the inadvertently missing Exhibits 4 and 5 which were inadvertently omitted.

Respectfully submitted,
THE JUREK LAW GROUP, PLLC.

By: /s/Lynne M. Jurek
Lynne M. Jurek
Texas Bar No. 11059250
Federal Bar No. 15489
lmjurek@jureklaw.com
4309 Yoakum Blvd.
Houston, Texas 77006
Tel. (713)230-8233
Fax. (713) 230-8654
ATTORNEY FOR OBJECTORS

Certificate of Service

I hereby certify that on the 5th day of April, 2022, I electronically filed a true and correct copy of the above foregoing Supplement to Objections to Sale Motion and Order using the CM/ECF system, which will serve the document to the parties that are registered or otherwise entitled to receive electronic notices listed below in this case pursuant to the Electronic Filing Procedures in this District.

Via Counsel CM/ECF:

catherine.curtis@wickphillips.com
;jason.rudd@wickphillips.com
Policy Services, Inc.
deeproot Pinball, LLC
deeproot Growth Runs Deep Fund, LLC
deeproot 575 Fund, LLC
deeproot 3 Year Bonus Income Fund, LLC
deeproot BonusGrowth 5 Year Debenture Fund,
LLC
deeproot Tech, LLC
deeproot Funds, LLC
deeproot Studios, LLC

Via CM/ECF:

USTPRegion07.SN.ECF@usdoj.gov
United States Trustee - SA12
US Trustee's Office
615 E Houston, Suite 533
San Antonio, TX 78295-1539

Via CM/ECF: rbattagliaw@outlook.com

Raymond W. Battaglia
Law Offices of Ray Battaglia, PLLC
66 Granburg Circle
San Antonio, TX 78218

deeproot Capital Management, LLC
12621 Silicon Dr.
San Antonio, TX 78249

Via Counsel Via CM/ECF:

catherine.curtis@wickphillips.com;
jason.rudd@wickphillips.com
Wizard Mode Media, LLC
12227 S. Business Park Drive, Suite 130
Draper, UT 84020
Debtor's Counsel

Via CM/ECF: pat.lowe.law@gmail.com

John Patrick Lowe
2402 East Main Street
Uvalde, TX 78801

Via CM/ECF:

catherine.curtis@wickphillips.com;
jason.rudd@wickphillips.com
Catherine A. Curtis
Jason M. Rudd
Wick Phillips Gould & Martin, LLP
3131 McKinney Ave, Suite 500
Dallas, TX 75204

Via CM/ECF: jpetree@mcslaw.com

Jonathan Petree
McGuire, Craddock & Strother, P.C.
500 N. Akard Street Suite 2200
Dallas, TX 75201

Via CM/ECF: jdunne@smfadlaw.com

John C. Dunne
SMFAD Law
1001 McKinney Street #1100
Houston, TX 77002

Via CM/ECF: bk-cmurphy@oag.texas.gov

Texas Workforce Commission
c/o Christopher S. Murphy
Texas Attorney General's Office
PO Box 12548
Austin, TX 78711

Via CM/ECF: rpulman@pulmanlaw.com

Randall A. Pulman
2161 NW Military Highway
Suite 400
San Antonio, Texas 78213

/s/ Lynne M. Jurek

Lynne M. Jurek